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>

To: "Bob Gunther" <bob\_gunther@or.blm.gov>  
cc:  
Subject: EIS - Pipeline

01/10/2003 04:58 PM

Bob Gunther, BLM

RE: EIS Final Comments on Pipeline

See: BLM response to Pat Simpson as given on page g2-12, 13 on the EIS

A BLM response to my previous letter said: "The planning commission restricted the submission of pipeline safety information before the May 2 meeting, and did not allow any interpretation of or member questions about the data."

This is not true. Check the record. The County Planning Commission had asked for information on safety and had even put off the hearing for a month in order to get such information. This information was not forthcoming so the commission made their decision based on what was at hand and denied the request since no evidence was given.

BLM response said "The action of the planning commission have no impact on any decision the BLM will make."

I thought that the whole NEPA purpose of an EIS was that it was supposed to be done BEFORE any Planning Commission hearing so that the EIS could be used as input to that hearing - not the other way around! The EIS was too late to be input to the Planning Decision. Why is the BLM trying to make their tardiness sound like a virtue?

BLM said "There is very little statistical chance that this pipeline will ever suffer a serious incident, and no precedent in Oregon or Washington that such an incident would cause a serious forest fire." There is also statistically little chance that your house will catch on fire, but that does not mean that you should not plan for fire extinguishers or fire insurance. The BLM comment is misleading and makes it sound like there is nothing to worry about a natural gas pipeline.

[http://ops.dot.gov/stats/tran\\_sum.htm](http://ops.dot.gov/stats/tran_sum.htm) (Dept of Transportation) web site says that for natural gas pipeline

OFFICE OF PIPELINE SAFETY  
NATURAL GAS PIPELINE OPERATORS  
INCIDENT SUMMARY STATISTICS BY YEAR  
1/1/1986 - 10/31/2002

TRANSMISSION OPERATORS

Year	No. of Incidents	Fatalities	Injuries	Property Damage
1986	83	6	20	\$11,166,262
1987	70	0	15	\$4,720,466
1988	89	2	11	\$9,316,078
1989	103	22	28	\$20,458,939
1990	89	0	17	\$11,302,316
1991	71	0	12	\$11,931,238
1992	74	3	15	\$24,578,165
1993	95	1	17	\$23,035,268
1994	81	0	22	\$45,170,293

1995	64	2	10	\$9,957,750
1996	77	1	5	\$13,078,474
1997	73	1	5	\$12,078,117
1998	99	1	11	\$44,487,310
1999	54	2	8	\$17,695,937
2000	80	15	18	\$17,868,261
2001	86	2	5	\$23,610,883
2002	68	1	5	\$23,673,073
<b>Totals</b>	<b>1356</b>	<b>59</b>	<b>224</b>	<b>\$324,128,830</b>

Note that this chart is just for "transmission" incidents on pipelines. There are additional DOT statistics for natural gas chart for incidents on the "distribution" of natural gas to users. Having the transmission pipeline means that we will have distribution lines also and the probability of incidents for distribution lines. This is a part of the cumulative impact of having a transmission line. Percentage-wise, there is probably more land of the Coos County pipeline going thru forest than for the the average pipeline in the nation. Therefore, there would be more chance of an accident causing a forest fire here than else where. Our rural fire chiefs pointed out that they do not have the necessary equipment, water supply to fight such a fire - should it happen. And if the pipeline goes down the Old Wagon road, they could be extremely hampered by lack of alternative roads to use to fight the fire. If I were to use BLM's reasoning, I should consider canceling my fire insurance on my house, since "there is little statistical chance ...".

It appears that the BLM is not acting in an unbiased manner. Cumulative impacts were not generally considered by the BLM. This makes a farce of a very expensive EIS that was done at the expense of the citizens of Coos County.

Sincerely,

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